

### **Remarks**

The Examiner has rejected pending claims 1-42 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,849,465 (Uchida). Applicants respectfully traverse this rejection.

Uchida teaches a photosensitive liquid precursor solution that polymerizes when exposed to ultraviolet radiation (see Uchida, col. 3, lines 16-18). In use, Uchida teaches that this precursor solution may be applied to an integrated circuit substrate as a film and exposed to ultraviolet radiation under a mask (see Uchida, col. 3, lines 34-35). The exposed portions will polymerize and remain on the substrate during development, and the unexposed portions, which are unpolymerized, are washed away when the film is developed (see Uchida, col. 3, lines 43-45; col. 11, lines 51-57).

To the contrary, the embodiments of the present invention claimed in independent claims 1 and 28 recite that a predetermined portion of the precursor layer is exposed and developed thereby substantially removing this predetermined portion. In other words, it is the exposed portion that is removed, whereas Uchida teaches that the exposed portion remains on the substrate. Therefore, Uchida teaches the opposite of the embodiments recited in claims 1 and 28 and does not teach or suggest the embodiments as recited in independent claims 1 and 28 or as recited in any of the corresponding dependent claims 2-27 and 29-39.

Regarding independent claims 40-42, Uchida does not teach or suggest titanium (IV) diisopropoxide bis(ethyl acetoacetate) as recited in these claims. For example, Uchida does not teach or suggest the diisopropoxide group, as each of the compounds taught by Uchida contain an acyloxy group (RCOO-), which is not a isopropoxide group. Therefore, Uchida does not teach or suggest the compound recited in claims 40-42.

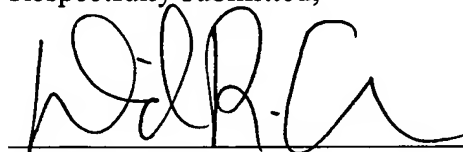
Based on the foregoing, Applicants respectfully request withdrawal of this rejection as to claims 1-42. Applicants believe that the application is in condition for allowance and request the same. To the extent there are any remaining issues, the Examiner may contact the undersigned by telephone.

Applicants believe that no fee is due with this submission. However, if it is determined that a fee is due, please charge the required fee to Morgan, Lewis & Bockius LLP Deposit Account No. 50-0310. A copy of this sheet is enclosed for this purpose.

Respectfully submitted,

Date: August 2, 2005

By: \_\_\_\_\_



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